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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JENNIFER BRONSON, CLEMENT CHIN,
And KEVIN SHIMAMOTO,

Plaintiffs,

v.

UNITED STATES CUSTOMS & BORDER
PROTECTION,

Defendant.

Case No. 4:18-cv-03156 KAW

**STIPULATION TO EXTEND DATES;
[PROPOSED] ORDER**

HON. KANDIS A. WESTMORE

Plaintiffs, by and through their attorney of record, and Defendant, by and through its attorneys of record, hereby stipulate, subject to the approval of the Court, to the following:

- 1) Plaintiffs filed this action on or about May 25, 2018. Defendant answered on or about July 6, 2018. This matter was brought by Plaintiffs under the Freedom of Information Act ("FOIA") concerning a December 2017 FOIA request.
- 2) On August 6, 2018, the parties conferred regarding scheduling a phone meeting to comply with certain case deadlines under the Court's scheduling order. However, the parties postponed a discussion of specifics at that time, because responsibility for defense of this action was in the process of being reassigned to an incoming AUSA, Ms. Daw, who has since appeared in this action.

- 3) On August 14, 2018, Customs and Border Protection (“CBP”) responded to the FOIA request, producing 380 pages of documents, many of which have been marked as duplicates and/or redacted pursuant to certain provisions of FOIA, including, but not limited to 5 U.S.C.A. §552(b)(5).
- 4) Due to the recent transfer of responsibility over this defense of this matter to Ms. Daw, and in order to allow Plaintiffs to review the documents before the parties prepare for and submit their joint case management conference statement, the parties respectfully request an extension of the deadlines in the Court’s Order Setting Initial Case Management Conference and ADR Deadlines, as follows:
- a. Last day for meeting and conferring re initial disclosures, early settlement, ADR process selection, and discovery plan shall be August 28, 2018.
 - b. Last day for filing ADR Certification shall be August 28, 2018.
 - c. Last day for filing the Rule 26(f) Report, complete initial disclosures or state objections in Rule 26(f) Report and file Case Management Statement shall be September 4, 2018.
 - d. The Initial Case Management Conference shall be September 11, 2018 at 1:30 p.m.

Date: August 16, 2018

Respectfully submitted,

ALEX G. TSE
United States Attorney

/s/
ALISON E. DAW¹
Assistant United States Attorney
Attorneys for Defendants

Dated: August 16, 2018

ORRICK HERRINGTON & SUTCLIFFE LLP

/s/
SUZETTE BARNES
Attorneys for Plaintiffs


¹ I, Alison E. Daw, hereby attest that I have been authorized to submit the electronic signatures indicated by a “conformed” signature (/s/) within this e-filed document. I apologize for any inconvenience caused by my failure to include this language in the original submission.

1 **~~PROPOSED~~ ORDER**

2 Pursuant to stipulation, the parties' last day to meet and confer regarding ADR, discovery plan,
3 and early settlement, and their last day to file the ADR Certification shall be August 28, 2018. The
4 parties' last day to file their Rule 26(f) Report, complete initial disclosures and file Case Management
5 Statements shall be September 4, 2018. The Initial Case Management Conference shall take place on
6 September 11, 2018 at 1:30 p.m. in the courtroom of the Honorable Kandis A. Westmore.

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8 IT IS SO ORDERED.

9 Date: 8/17/18

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11 KANDIS A. WESTMORE
12 United States Magistrate Judge
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